

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

**In Re:**

**JAMES F. DUDLEY,**

**Debtor.**

**Case No. 12-10748-NLJ  
Chapter 13**

**OBJECTION TO MOTION TO DISMISS,  
MOTION TO MODIFY CONFIRMED PLAN,  
NOTICE OF OPPORTUNITY FOR HEARING  
AND REQUEST FOR COMPENSATION**

James F. Dudley, by and through his attorney of record, hereby objects to the Motion to Dismiss ("Motion") his chapter 13 case for the reason that the Debtor expects to cure the feasibility problem noted in the Motion through the motion to modify his confirmed plan contained herein.

Accordingly, the Debtor, pursuant to Title 11 U.S.C. §1329(a)(1) moves this Court to modify his existing confirmed plan entered herein so as to provide for the following terms:

1. Paragraph number 1(a) should be modified to provide for a payment of \$1,557.00 beginning in March, 2015. The modified plan should be considered current through February, 2015. The plan term should be extended to sixty (60) months from the month in which it was confirmed resulting in the plan ending in July, 2017.
2. Debtor's attorney requests a fee in the amount of \$500.00 for filing this objection and motion to modify payable at the rate of \$75.00 per month beginning in the month following entry of an order resolving this motion.

Wherefore, the Debtor requests that the Court deny the Trustee's Motion to Dismiss his case and allow his Plan modified as set out above.

Dated: February 9, 2015.

S/Gary L. Morrissey

GARY L. MORRISSEY, OBA #6438

1725 Linwood Boulevard

Oklahoma City, Oklahoma 73106

g.morrissey@yahoo.com

(405) 272-1500

Fax: (405) 272-3090

Attorney for Debtor

Certificate of Service

I hereby certify that on this 9<sup>th</sup> day of February, 2015, a true and correct copy of the above objection and motion was served by the ECF system of this Court to: John Hardeman, chapter 13 trustee, [jhardeman@chp13okc.com](mailto:jhardeman@chp13okc.com); Gretchen Crawford, Esq., [grecra@oklahomacounty.org](mailto:grecra@oklahomacounty.org), attorney for Oklahoma County Treasurer; and mailed, first class U.S. Mail, postage prepaid, to the creditors listed on Exhibit A below.

S/Gary L. Morrissey

Gary L. Morrissey

**NOTICE OF OPPORTUNITY FOR HEARING**

**Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document.** If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than 21 days from the date of filing of this request for relief. You should also serve a file-stamped copy of your response or objection to the undersigned movant/movant's attorney and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice.

**The 21 day period includes the three (3) days allowed for mailing provided for in Bankruptcy Rule 9006(f).**

JEFFERSON CAPITAL SYSTEMS, LLC  
PO BOX 7999  
SAINT CLOUD, MN 56302

ROBERT HAUGE  
BAER TIMBERLAKE COULSON CATES  
6846 S CANTON AVE STE 100  
TULSA, OK 74136

WORLD ACCEPTANCE CORP  
1200 S AIR DEPOT BLVD STE N  
MIDWEST CITY, OK  
73110

**Exhibit A**